

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

Oral Argument Requested

**NOTICE OF DEFENDANTS' JOINT MOTION TO EXCLUDE  
THE OPINIONS OF DAVID MADIGAN, PH.D.**

**PLEASE TAKE NOTICE** that on January 18, 2022, or as soon as counsel may be heard, the undersigned Defense Executive Committee counsel, on behalf of all Defendants named in the operative Master Personal Injury Complaint ("PI Complaint") (Dkt. [122](#)), the operative Consolidated Second Amended Economic Loss Class Action Complaint (Dkt. [398](#)), and the operative Consolidated Amended Medical Monitoring Class Action Complaint ("MM Complaint") (Dkt. [123](#)) shall move for the entry of an Order excluding the opinions of Plaintiffs' expert, David Madigan, Ph.D., pursuant to Federal Rules of Evidence 702, 403, and 104.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, the undersigned defendants shall rely upon the Memorandum of Law in Support submitted herewith, and any reply submissions made hereafter; and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted  
herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: November 1, 2021

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 1, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Seth A. Goldberg  
Seth A. Goldberg